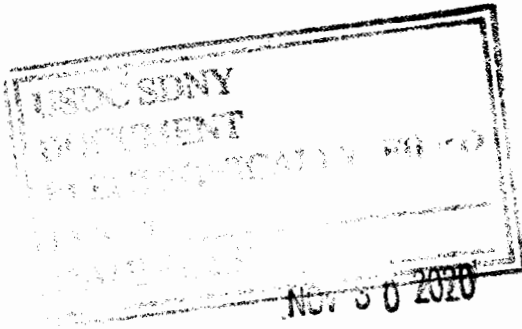


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November 23, 2020

VIA ECF

The Honorable George B. Daniels
United States District Judge
500 Pearl Street
New York, New York 10007

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.
NOV 30 2020

Dated: _____

Re: TC Skyward Aviation U.S., Inc. v. Deutsche Bank AG, New York Branch, Case No. 1:20-cv-08157-GBD

Dear Judge Daniels:

We represent the defendant, Deutsche Bank AG New York Branch ("Defendant") in the above-referenced action. Pursuant to Rule I(D)(ii)(2) of Your Honor's Individual Rules and Practices, we write to request permission to file under seal Exhibit A to the Declaration of Mark N. Parry in Support of Defendant's Motion to Dismiss.

Exhibit A is a Sale And Lease Back Agreement for Boeing 777 Components between TAM Linhas Aereas and 777 Components Leasing, LLC (the "Agreement"), referred to in Plaintiff TC Skyward Aviation U.S., Inc.'s ("Plaintiff") Complaint at paragraph 9. Page 1 of the Agreement contains a "Proprietary Information Notice" and prohibits Defendant from disclosing the Agreement to any third party "without the express written consent of each party."

In accordance with Rule I(D)(ii)(1) of Your Honor's Individual Rules and Practices, Defendant has conferred with counsel for Plaintiff, who represented that Plaintiff was unable to consent to this letter motion without consulting with the parties to the Agreement.

Accordingly, we respectfully request permission to file the Agreement under seal.

Respectfully yours,

/s/ Mark N. Parry

Mark N. Parry

MNP:mb